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7	Attorneys for Plaintiff, Deutsche Bank National Trust Company, Formerly Known as Bankers Trust Company of California, N.A., as Trustee for American Home Mortgage Investment Trust				
8	2005-2	for intericult from Morigage invesiment frust			
9		DISTRICT COLIDT			
10	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA				
11	DEUTSCHE BANK NATIONAL TRUST	Case No.: 2:20-cv-01885-APG-VCF			
12	COMPANY, FORMERLY KNOWN AS BANKERS TRUST COMPANY OF				
13	CALIFORNIA, N.A., AS TRUSTEE FOR	STIPULATION AND ORDER TO			
14	AMERICAN HOME MORTGAGE	EXTEND TIME PERIOD TO RESPOND			
15	INVESTMENT TRUST 2005-2,	TO COMMONWEALTH LAND TITLE INSURANCE COMPANY'S			
	Plaintiff,	OPPOSITION TO COUNTERMOTION			
16	VS.	FOR PARTIAL SUMMARY			
17	FIDELITY NATIONAL TITLE GROUP,	JUDGMENT [ECF No. 36]			
18	INC.; FIDELITY NATIONAL TITLE	[Third Request]			
19	INSURANCE COMPANY; COMMONWEALTH LAND TITLE				
	INSURANCE COMPANY; DOE				
20	INDIVIDUALS I through X; and ROE				
21	CORPORATIONS XI through XX, inclusive,				
22	Defendants.				
23	DI COS DA LA DA LA				
	Plaintiff, Deutsche Bank National Trust Company, Formerly Known as Bankers Trus				
24	Company of California, N.A., as Trustee for American Home Mortgage Investment Trust 2005				
25	2 ("Deutsche Bank") and Defendant, Com	nmonwealth Land Title Insurance Company			
26	("Commonwealth"), by and through their attorneys of record, hereby stipulate and agree as				
27	follows:				
28					

	1.	On September 23, 2020, Deutsche Bank filed its Complaint in the Eighth Judicial
		District Court, Case No. A-20-821781-C [ECF No. 1-1];
	2.	On October 8, 2020, Commonwealth filed a Petition for Removal to this Court [ECF
		No. 1];
	3.	On October 13, 2020, Commonwealth filed a Motion to Dismiss [ECF No. 4];
	4.	On November 30, 2020, Deutsche Bank filed an Opposition to Commonwealth's
		Motion to Dismiss and Countermotion for Partial Summary Judgment [ECF Nos. 24
		and 25];
	5.	On December 21, 2020, Commonwealth filed its Reply in Support of its Motion to
		Dismiss and Opposition to Countermotion for Partial Summary Judgment [ECF No.
		36];
	6.	Deutsche Bank contends that it is entitled to file a response to Commonwealth's
		Opposition to its Countermotion for Partial Summary Judgment and that its deadline
		to do so is January 19, 2021 [ECF No. 40];
	7.	Deutsche Bank's counsel is requesting a fourteen day extension to respond to
		Commonwealth's Opposition, until February 2, 2021;
	8.	This extension is requested to allow Deutsche Bank additional time to finalize and
		file its response to the pending Opposition in light of an unexpected medical
		emergency experienced by the lead handling counsel for Deutsche Bank;
	9.	Counsel for Commonwealth does not oppose the requested extension to the extent
		that a response is permitted;
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1	10. This is the third request for an extension which is made in good faith and not fo			
2	purposes of delay.			
3	IT IS SO STIPULATED.			
4	DATED this 19 th day of January, 2021.	DATED this 19 th day of January, 2021.		
5	WRIGHT, FINLAY & ZAK, LLP	SINCLAIR BRAUN LLP		
6 7	/s/ Lindsay D. Robbins Lindsay D. Robbins, Esq.	/s/ Kevin S. Sinclair Kevin S. Sinclair, Esq.		
8 9	Nevada Bar No. 13474 7785 W. Sahara Ave., Suite 200 Las Vegas, NV 89117	Nevada Bar No. 12277 16501 Venture Blvd., Suite 400 Encino, CA 91436		
10	Attorneys for Plaintiff, Deutsche Bank National Trust Company, Formerly Known as	Attorneys for Defendants, Commonwealth Land Title Insurance Company, Fidelity		
11 12	Bankers Trust Company of California, N.A., as Trustee for American Home Mortgage Investment Trust 2005-2	National Title Group, Inc., and Fidelity National Title Insurance Company		
13				
14	IT IS SO ORDERED.			
15	DATED this 19th day of January, 2021.			
16	IIN	UITED STATES DISTRICT JUDGE		
17		THED STATES DISTRICT JUDGE		
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